

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN HUTCHINSON,

Plaintiff,

v.

COMCAST CORPORATION

and

COMCAST CABLE  
COMMUNICATIONS  
MANAGEMENT, LLC

Defendants.

Civil Action No. 2:21-cv-02442

**JOINT STIPULATION AND [PROPOSED] ORDER TO  
STAY DISCOVERY PENDING SETTLEMENT CONFERENCE**

Plaintiff John Hutchinson (“Plaintiff”) and Defendants Comcast Cable Communications Management, LLC and Comcast Corporation (“Defendants” and collectively with Plaintiff, the “Parties”), by and through their respective attorneys, hereby stipulate and agree as follows:

WHEREAS, on May 28, 2021, Plaintiff filed a Complaint against Defendants (Dkt. 001);

WHEREAS, on August 8, 2021, Defendants filed their Answer to Plaintiff’s Complaint (Dkt. 004);

WHEREAS, on September 17, 2021, the Parties participated in the Rule 26(f) conference and commenced discovery;

WHEREAS, on September 17, 2021, the Parties exchanged Rule 26(a) initial disclosures and served discovery requests;

WHEREAS, on October 25, 2021, the Court scheduled an initial pretrial conference for December 1, 2021, and referred this matter to a settlement conference before Magistrate Judge Timothy R. Rice;

WHEREAS, the Parties are exploring the potential resolution of this matter and will participate in a settlement conference before Magistrate Judge Timothy R. Rice on December 22, 2021;

WHEREAS, the Parties agree to stay discovery pending the outcome of the settlement conference, with the exception that they will engage in a limited, informal exchange of discovery for the purpose of facilitating settlement discussions as mutually agreed by the Parties;

WHEREAS, the Court has not yet set a deadline for the close of discovery in this matter;

WHEREAS, the Parties will provide an update to the Court by December 29, 2021, regarding the settlement conference and the status of the Parties' settlement discussions;

WHEREAS, as the Parties jointly request this stay, neither will be prejudiced. The requested stay of discovery is temporary and will serve the interests of judicial economy and the convenience of both the Court and the Parties. This is the first stipulation to stay that the Parties have requested and they seek the stay in good faith and not for the purpose of delay or any other improper purpose.

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND ORDERED THAT:

1. This action is stayed pending the forthcoming December 22, 2021 settlement conference.
2. The Parties shall provide an update to the Court by December 29, 2021 regarding the outcome of the settlement conference and the status of the Parties' settlement discussions.

Respectfully submitted,

/s/ Rahul Munshi

Rahul Munshi (PA ID No. 307548)

/s/ Sean R. Caulfield

Michael L. Banks (PA ID No. 35052)

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*Attorney for Plaintiff*

Dated: November 16, 2021

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*Attorneys for Defendants*

Dated: November 16, 2021

SO ORDERED this 17th day of November, 2021.

/s/ Jeffrey L. Schmehl

Honorable Jeffrey L. Schmehl, U.S.D.J.